

1 THE HONORABLE JAMES L. ROBART
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 SEATTLE DIVISION

11 FULLTIME FANTASY SPORTS, LLC a
12 Delaware limited liability company,

13 Plaintiff,
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15 v.
16 STEVEN and JANE DOE RINDNER, and
17 their marital community; MARK and JANE
18 DOE STIEGLITZ, and their marital
19 community; DOUG and JANE DOE SMITH,
20 and their marital community; CRAIG and
21 JANE DOE MALLITZ, and their marital
22 community; ROSS and JANE DOE
23 LEVINSOHN, and their marital community;
24 ROSS and JANE DOE LUKATSEVITCH, and
25 their marital community; JOE and JANE DOE
ROBINSON, and their marital community;
TAMMER and JANE DOE FAHMY, and their
marital community; MAYO and JANE DOE
STUNTZ, and their marital community;
JAMES and JANE DOE HECKMAN, and
their marital community, PAUL and JANE
DOE McNICHOL, and their marital
community thereof; ANDREW and JANE
DOE RUSSELL, and their marital community
thereof; HOWARD and JANE DOE LIPSON,
and their marital community thereof, PILOT
GROUP, GP, LLC, a Delaware corporation;
and JANE and JOHN DOES 1 through 8,

26 Defendants.
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Case No. 2:17-cv-00920-JLR

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**STIPULATION AND [PROPOSED] ORDER
EXTENDING DEADLINE TO FILE JOINT
STATUS REPORT AND DISCOVERY PLAN**

[Signature]
Noting Date: September 27, 2017

1 Pursuant to LCR 10(g), Plaintiff Fulltime Fantasy Sports, LLC and Defendants Tammer
2 Fahmy, Howard Lipson, Ross Lukatsevich, Craig Mallitz, Paul McNicol, Joe Robinson, Andrew
3 Russell, Doug Smith, Mark Stieglitz, and Mayo Stuntz¹ hereby stipulate to and request an
4 extension of the Parties' deadline to file their Joint Status Report and Discovery Plan as set forth
5 in the Court's Order regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt.
6 No. 8) as modified by the Parties' previous stipulation and resulting order (Dkt. No. 11).

7 Good cause exists for the requested extension for the following reasons: Counsel for the
8 Parties conferred by telephone on September 7, 2017. Defendants stated their position that,
9 because Plaintiff asserts a securities-fraud claim brought under Section 10(b) of the Securities
10 Exchange Act of 1934, the Private Securities Litigation Reform Act ("PSLRA") stays all discovery
11 in this case during the pendency of Defendants' motions to dismiss (Dkt. Nos. 18, 20, 21). *See* 15
12 U.S.C. § 78u-4(b)(3)(B). Plaintiff agreed to stipulate to a stay of discovery while the motions to
13 dismiss are pending, without waiving any rights as to whether the PSLRA properly applies to this
14 action or other proceedings.

15 In light of the foregoing, the Parties further stipulated and agreed that, if the Court denies
16 the motions to dismiss in whole or in part, they will confer again and submit their Joint Status
17 Report and Discovery Plan within 30 days after the order denying the motions in whole or in part.
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19 Dated: September 27, 2017

COOLEY LLP

20 By: /s/ Christopher B. Durbin

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26 Attorneys for Defendants TAMMER and JANE DOE
27 FAHMY, HOWARD and JANE DOE LIPSON, ROSS and

28 ¹ The First Amended Complaint lists as additional defendants Jane Doe spouses and the marital
communities for each Defendant.

1 JANE DOE LUKATSEVICH, CRAIG and JANE DOE
2 MALLITZ, PAUL and JANE DOE McNICHOL, JOE and
3 JANE DOE ROBINSON, ANDREW and JANE DOE
4 RUSSELL, and MAYO and JANE DOE STUNTZ

5 DLA PIPER LLP (US)

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17 Attorneys for Defendants DOUG SMITH and JANE
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28 Attorneys for Plaintiff FULLTIME FANTASY SPORTS,
29 LLC

ORDER

Pursuant to the Parties' stipulation, all discovery in this case is stayed during the pendency of Defendants' motions to dismiss (Dkt. Nos. 18, 20, 21). Within 30 days after an order denying the motions to dismiss in whole or in part, the Parties shall confer and file their Joint Status Report and Discovery Plan.

6 It is so ORDERED.

8 Dated: 28 September , 2017

The Honorable James L. Robart
UNITED STATES DISTRICT JUDGE

Presented by:

/s/ Christopher B. Durbin

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September, 2017, I electronically filed the foregoing **STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE JOINT STATUS REPORT AND DISCOVERY PLAN** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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18 Attorneys for Defendants DOUG SMITH and
19 JANE DOE SMITH and MARK STIEGLITZ and
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